

EXHIBIT A



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Case Detail - Public

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Louis S Toll, et al Plaintiff vs. Florida Power & Light Company Defendant

Broward County Case Number: CACE23002133
State Reporting Number: 062023CA002133AXXXCE
Court Type: Civil
Case Type: Other
Incident Date: N/A
Filing Date: 02/20/2023
Court Location: Central Courthouse
Case Status: Pending
Magistrate Id / Name: N/A
Judge ID / Name: 04 Haury, William W., Jr.

— Party(ies)

Total: 3



Party Type	Party Name	Address	Attorneys / Address ★ Denotes Lead Attorney
Plaintiff	Toll, Louis S		★ Vigh, Balazs Retained Bar ID: 1031540 Bromagen Rathet Klee & Smith. P.A. 100 NE 3rd Ave Fort Lauderdale,, FL 33301-1176 Status: Active
Plaintiff	Toll, Stacy S		★ Vigh, Balazs Retained Bar ID: 1031540 Bromagen Rathet Klee & Smith. P.A. 100 NE 3rd Ave Fort Lauderdale,, FL 33301-1176 Status: Active
Defendant	Florida Power & Light Company		★ Sternberg, Jason David Retained Bar ID: 72887 Hogan Lovells US LLP 600 Brickell Ave Ste 2700 Miami, FL 33131-3085 Status: Active Williamson, Samuel Gates Retained Bar ID: 1033817 Mr Samuel Gates Williamson Quinn Emanuel 2601 S Bayshore Dr Ste 1550 Miami, FL 33133-5417 Status: Active

- Disposition(s)				Total: 0
Date	Statistical Closure(s)			
Date	Disposition(s)	View	Page(s)	^










- Collection(s)

Total: 0

There is no Collection information available for this case.

- Event(s) & Document(s)

Total: 12

Date	Description	Additional Text	View	Pages
03/20/2023	Notice of Unavailability			1
03/17/2023	Order Extending Time	TO RESPOND TO COMPLAINT		2
03/16/2023	Motion for Extension of Time			5
03/14/2023	Notice of Appearance	Party: <i>Defendant</i> Florida Power & Light Company		2
03/10/2023	Notice of Appearance	Party: <i>Defendant</i> Florida Power & Light Company		2
02/27/2023	Summons Returned Served	27th day of February, 2023 Party: <i>Defendant</i> Florida Power & Light Company		1
02/20/2023	Per AOSC20-23 Amd12, Case is determined General			
02/20/2023	Civil Cover Sheet	Amount: \$100,001.00		3
02/20/2023	Complaint (eFiled)	Party: <i>Plaintiff</i> Toll, Louis S <i>Plaintiff</i> Toll, Stacy S		162
02/20/2023	eSummons Issuance	FLORIDA POWER & LIGHT COMPANY		1



Date	Description	Additional Text	View	Pages
02/20/2023	Clerk's Certificate of Compliance W-2020-73CIV/2020-74-UFC	NONE		1
02/20/2023	Clerk's Certificate of Compliance W-2020-73CIV/2020-74-UFC	NONE		1

— Hearing(s)

Total: 0

There is no Disposition information available for this case.

— Related Case(s)

Total: 0

There is no related case information available for this case.

Brenda D. Forman

Clerk of Court

Broward County
17th Judicial Circuit

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Main Courthouse Location

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Fort Lauderdale
Florida, US 33301
Phone: (954) 831-6565

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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN
AND FOR BROWARD COUNTY, FLORIDA

Louis S Toll ; Stacy S Toll
Plaintiff

Case No: 23-2133

Judge Division: 04

VS

Florida Power + Light Company.
Defendant

CLERK'S CERTIFICATE OF COMPLIANCE

I hereby certify that pursuant to Administrative Order, No. 2020-73Civ/2020-74-UFC:
"ADMINISTRATIVE ORDER DIRECTING CLERK OF COURTS WITH REGARD TO
DISMISSED CIVIL OR FAMILY CASES",

The Clerk has conducted a search for all previous existing civil cases related to
these two parties.

Listed below are all the aforementioned related cases:

NONE

Brenda D. Forman
Circuit and County Courts

By: Mag O'Neil

Deputy Clerk



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Brenda D. Forman
Circuit and County Courts

By: Mag O'Neil

Deputy Clerk



IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER: CACE-23-002133

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

CIVIL ACTION SUMMONS

THE STATE OF FLORIDA

To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this summons and a copy of the complaint or petition in this action on Defendant:

By Serving: FLORIDA POWER & LIGHT COMPANY
Registered Agent: David M. Lee
700 Universe Blvd.
Juno Beach, Florida 33408

Each defendant is required to serve written defenses to the complaint or petition on Plaintiff's attorney, to wit:

whose address is:

BALAZS VIGH, ESQUIRE
THE LEGAL WAY, P.A.
1835 E. Hallandale Beach Blvd. Suite 872.
Hallandale Beach, FL 33009
(954) 816-8155 – Telephone

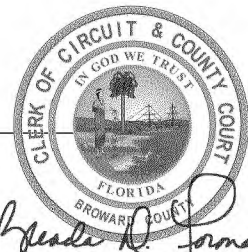
within 20 days after service of this summons on that defendant/respondent, exclusive of the day of service, and to file the original of the defenses with the Clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED ON ____ FEB 21 2023

As Clerk of said Court

BY: _____

As Deputy Clerk
(Court Seal)



BRENDA D. FORMAN

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

COMPLAINT

Plaintiffs, Louis and Stacy Toll (“Plaintiffs”) hereby file this Complaint against Defendant Florida Power & Light Company (“Defendant or FPL”) on behalf of themselves and those similarly situated and allege as follows:

INTRODUCTION

1. This is an action for Common Law Nuisance arising from Defendant’s actions rendering Plaintiffs unsafe and insecure in life and interfering with the use and enjoyment of their property.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this dispute because this Complaint seeks damages in excess of \$30,000.00 dollars, exclusive of interest and attorney’s fees.

3. Venue is proper in Broward County, Florida because the cause of action arose and is ongoing in Broward County, Florida. All Plaintiffs are residents of Broward County Florida

and FPL is a Florida Corporation who operated and continues to operate the subject Power Plants in Broward County Florida.

PARTIES

4. All Plaintiffs are over the age of majority and are otherwise sui juris.

5. FPL is a corporation licensed to conduct and continuously conducts business in the State of Florida, including Broward County and Defendant's powerplant in located in Broward County, and is otherwise sui juris.

FACTUAL BACKGROUND

6. Louis and Stacy S. Toll own a house in the residential neighborhood of Davis Isles, located in the city of Dania Beach, Broward County, Florida, and reside in their house year-round. *See* map marking FPL's power plant and Plaintiff's home attached hereto as Exhibit "A."

7. Davis Isles is a waterfront residential neighborhood located about 50 yards from a tract of land that houses FPL's power plant and about 80 yards from the power plant itself. *See* map marking Davis Isles and FPL's power plant attached hereto as Exhibit "B."

8. FPL owns the large tract of neighboring land to Plaintiffs' home and operated the old power plant until 2018 ("Old Power Plant") then built a new power plant ("New Power Plant") on said land.

9. Plaintiffs have only had a few minor and one major issue associated with the operation of the Old Power Plant. The minor issues were corrosive vapors from the Old Power Plant causing damage to the finish of boats and vehicles. The major issue being a large explosion of the Old Power Plant in 2016, shaking Plaintiffs' homes and sending 100-foot flames in the air

for over four hours, only about 100 yards from Plaintiffs' homes. *See* Plaintiffs' images of the extreme fire that followed the explosion attached hereto as Exhibit "C."

10. In 2017 FPL publicly announced the tearing down of its Old Power Plant and the building of the New Power Plant called Dania Beach Clean Energy Center at the Davis Isles Homeowners Association meeting held on or around June 21, 2017. *See* minutes from the meeting attached hereto as Exhibit "D."

11. At said Davis Isles Homeowners Association meeting, FPL's speakers Tammy Richards and Jackie Kingston amongst other things promised the homeowners of Davis Isles that the New Power Plant will be much quieter and work on the teardown of old and build of new plant will be from 8-5 Monday through Friday and some Saturdays for two and a half years. *See* Exhibit "D."

12. Starting in 2018, FPL started the demolition of its Old Power Plant and started building a new power plant ("New Power Plant") which was first turned on in January 2022.

COUNT I – COMMON LAW NUISANCE

13. In 2016 part of the Old Power Plant complex exploded violently shaking the home of Plaintiffs, sending 100-foot flames into the air causing Plaintiffs to run for cover fearing for their lives. The explosion was followed by an intense fire that lasted about four hours creating very high level of heat that the Plaintiffs watching the fire from their own backyard had to back away because their faces and hands were getting burned from the extreme heat radiating from the fire. This incident struck fear into the hearts of Plaintiffs who realized just how dangerous the power plant next door is. From that day on Plaintiffs feared losing their lives and their homes. *See* Exhibit "C." "[N]eighbors have a common law duty not to interfere with, or to

render each other unsafe or insecure in life.” See *Windward Marina, L.L.C. v. City of Destin*, 743 So. 2d 635, 639 (Fla. 1st DCA 1999) (citing *Prior v. White*, 132 Fla. 1, 180 So. 347, 355 (Fla. 1938)).

14. On or around March 2018 FPL started the demolition of the Old Power Plant.

15. On or around April 18, 2018, loud sound of heavy machinery and industrial tools started to come from the demolition site of the Old Power Plant next door which was continuous for approximately nine months. The disturbing noise started as early as 2:00 A.M but usually picked up between 4-5:00 A.M. The sound consisted of industrial engines hard at work, industrial machinery hard at work, the sound of large engines struggling under heavy load using engine break and reverse alarm. These sounds disturbed and kept Plaintiffs from sleeping at night and from resting and enjoying their homes during the day, lasting for approximately 9 months including weekends. The two United States Supreme Court cases of *United States v. Causby*, 328 U.S. 256, 66 S. Ct. 1062, 90 L. Ed. 1206, and *Griggs v. Allegheny County*, 369 U.S. 84, 82 S. Ct. 531, 7 L. Ed. 2d 585 (1962) “in substance held that noise can be a nuisance” which holding was adopted by the Fla. 1st DCA: “the land owner has a right to be free from unreasonable interference caused by the noise, and if such noise and/or intense vibration produced . . . deprived such owner of an essential element in his relationship to his land, compensation therefor should be made.” *City of Jacksonville v. Schumann*, 199 So. 2d 727, 729 (Fla. 1st DCA 1967). Also, in *Clark v. Bluewater Key RV Ownership Park Prop. Owners Ass’n*, Plaintiff’s nuisance allegations were based on complaints by lot owners regarding the noise of vehicles. The lower court entered a judgment in favor of Plaintiff enjoining commercial activity and on appeal the Fla. 3rd DCA upheld the judgement concluding that commercial vehicle noise

can be a nuisance. *Clark v. Bluewater Key RV Ownership Park Prop. Owners Ass'n*, 226 So. 3d 276, 279, 280, 283 (Fla. 3d DCA 2017)

16. Around the beginning of January 2019, the demolition site of the Old Power Plant started to release strong fuel fumes. The smell of fuel was so strong that it made Plaintiffs nauseous, and after being exposed to the fumes for 5-10 minutes Plaintiffs experienced headaches. More than 10 minutes of inhaling the fumes induced migraine headaches and vomiting in Plaintiffs. The fumes continued to flow for months, and Plaintiffs could not stay for more than a few minutes outside their house. During the months of fuel fumes Plaintiffs were unable to use and enjoy their yard, patio, barbeque, boats, paddleboards, kayaks, or wash their cars. Plaintiffs were not able to open their windows to let fresh air inside or sleep with the windows open or walk their dogs. Plaintiffs feared for their lives thinking something is going to ignite the fumes and cause an explosion or fire, killing or injuring Plaintiffs and/or destroying their home. The extended several month-long exposures to the fumes enabled it to penetrate the home of Plaintiffs forcing them to live with nausea and headaches on a daily basis for several months. FPL admitted that the fuel fumes came from its fuel container facility next door where the demolition of the Old Power Plant was ongoing. Defendant also admitted that the fumes came from contaminated soil that was being removed from the site. Defendant apologized but again, Plaintiffs were deprived of the use and enjoyment of their property and lived with headaches and nausea while fearing for their lives for months. *See* Communication between Plaintiffs and FPL attached hereto as Exhibit "E." "The noise, vibrations, and noxious emissions were found to constitute a nuisance on the authority of *Nitram Chemicals, Inc. v. Parker*, 200 So.2d 220 (Fla. 2d DCA 1967)," *cert. denied*, 204 So.2d 330 (Fla. 1967), and *City of Lakeland v. Douglass*, 143 Fla. 771, 197 So. 467 (1940). In *Exxon Corp., U.S.A. v. Dunn* "the judge

concluded that the noise and vibrations through the air and ground, and the sulphurous gas emissions, caused personal injury to each of the appellees in varying severity, appellees having suffered damages due to annoyance, discomfort, inconvenience, and sickness during the times of their exposure to those conditions [relying on the authority of] *Nitram Chemicals, Inc. v. Parker*,” *Exxon Corp., U.S.A. v. Dunn*, 474 So. 2d 1269, 1271- 1273 (Fla. 1st DCA 1985).

17. On or around January 27, 2020, Plaintiffs woke up to the operations of heavy machinery with the sound of trucks backing up using reverse warning sounds around 4:30 A.M. These loud beeping sounds were coming from the demolition site of the Old Power Plant next door. The loud and annoying beeping was continuous all night and all day on and off for about nine months. Plaintiffs complained to FPL’s representative Tammy Richards that they could not sleep because the beeping continues through the night, but FPL did nothing to stop the beeping although alternative quietly operation for reversing trucks is possible by disconnecting or switching off the reverse warning sounds or by employing radar or strobe reverse warning systems. The loud and continuous beeping of reverse warning sounds all day and all night drove Plaintiffs insane. Again, Plaintiffs suffered for months from the loud and annoying sounds coming from FPL’s construction site next door, depriving them of sleep during the night and the use and quite enjoyment of their property during the day. FPL acknowledged and admitted that FPL was conducting construction work throughout several nights in January 2020 and informed Plaintiffs that it will continue until June of 2020. *See* communication between Plaintiffs and FPL attached hereto as Exhibit “F.” The two United States Supreme Court cases of *United States v. Causby*, 328 U.S. 256, 66 S. Ct. 1062, 90 L. Ed. 1206, and *Griggs v. Allegheny County*, 369 U.S. 84, 82 S. Ct. 531, 7 L. Ed. 2d 585 (1962) “in substance held that noise can be a nuisance” which holding was adopted by the Fla. 1st DCA: “the land owner has a right to be free from

unreasonable interference caused by the noise, and if such noise and/or intense vibration produced . . . deprived such owner of an essential element in his relationship to his land, compensation therefore should be made.” *City of Jacksonville v. Schumann*, 199 So. 2d 727, 729 (Fla. 1st DCA 1967). Also, in *Clark v. Bluewater Key RV Ownership Park Prop. Owners Ass’n*, Plaintiff’s nuisance allegations were based on complaints by lot owners regarding the noise of vehicles. The lower court entered judgment in favor of Plaintiff enjoining commercial activity and on appeal the Fla. 3rd DCA upheld the judgement concluding that commercial vehicle noise can be a nuisance. *Clark v. Bluewater Key RV Ownership Park Prop. Owners Ass’n*, 226 So. 3d 276, 279, 280, 283 (Fla. 3d DCA 2017)

18. On or around June 14, 2020, the loud noises from commercial activity intensified again and the beeping of reverse warning sounds and the sound of heavy machinery was back starting 4:30 a.m. each day waking up Plaintiffs and keeping them from sleeping. A prior owner of 4407 SW 38 Terrace, Michel Fortin, and Plaintiffs communicated among each other and sent text messages to Tammy Richards complaining about the early start, but no changes were made, and Plaintiffs were forced to wake up at 4:30 A.M. daily for about 2 months. *Id.* See communication sent to FPL attached hereto as Exhibit “G.”

19. On or around February 2021, Plaintiffs woke up to construction dust and debris covering their boats, cars and all of their property. Plaintiffs contacted FPL’s Tammy Richards and complaint about the dust and debris but she claimed that it did not come from FPL’s plant and Plaintiffs were stuck cleaning up the mess. See communication between Plaintiffs and Tammy Richards attached hereto as Exhibit “H.”

20. On or around March 2, 2021, Plaintiffs were again unable to sleep due to the sound of commercial vehicles hard at work and their reverse warning sound coming from trucks

backing up all night long. These loud beeping sounds were coming from the demolition site next door and were continuous all night and all day for about a month. The prior owner of 4407 SW 38 Terrace, Michel Fortin, complained to Tammy Richards that they cannot sleep because the commercial vehicle noise and the beeping continues through the night, but FPL did nothing to stop the disturbing sounds, although FPL could have asked the workers to start work at a more reasonable time. *Id.* See communication between Plaintiff, Stacy Toll and prior owner of 4407 SW 38 Terrace, Michel Fortin, attached hereto as Exhibit "I."

21. On January 18, 2022, the City of Dania Beach posted on its Facebook page that the testing of the New Power Plant will begin on January 20, 2022, and will last until June 2022 which will "result in temporary intermittent noises in order to prepare the facility for service." See the post from the City Dania Beach Facebook site attached hereto as Exhibit "J."

22. The temporary noises mentioned above included a month-long steam cleaning of the pipes that was so loud that it shook Plaintiffs homes and Plaintiffs were able to measure 94 decibel noise levels on their property. At times Plaintiffs were unable to sleep or rest due to the New Power Plant emitting extremely loud noise all day and all night and at times Plaintiffs were unable to enjoy their homes or work from home due to the extreme noise coming from the New Power Plant all day. This extreme torture of Plaintiffs lasted for about a month during which Plaintiffs felt evicted from their homes. Plaintiffs called FPL's representative Tammy Richards who stated that there is nothing she can do and provided Plaintiffs with the phone number for the FPL Dania Beach Clean Energy Center Manager (954) 797-3615. Plaintiffs contacted the Plant manager about the extreme noise coming from the New Power Plant whom did not return Plaintiffs' call and did nothing to stop or reduce the extreme noise. See communication between Plaintiffs and Tammy Richards attached hereto as Exhibit "K."

23. By January 30, 2022, the situation escalated to the point where Plaintiffs have not slept for about a week. Plaintiffs even tried calling 911 but nothing was done and the torture by sound continued around the clock.

24. On January 30, 2022, one of the Plaintiffs drove to the New Power Plant site at 3:00A.M. in the morning to beg them to stop the noise. The gate was open, and Plaintiff drove right through. Inside the Plant she found a white truck with an FPL employee inside. She walked to the driver side door and asked him to turn the noise down for a little while so that the resident of Davis Isles can sleep for a few hours before having to go to work. The man told her there was nothing he could do, and the extreme noise will continue for at least three weeks. And the extreme torture by sound continued for weeks and Plaintiffs continued to suffer. In *Exxon Corp., U.S.A. v. Dunn*, “[t]he trial judge concluded that Exxon did not exercise reasonable care toward appellees in preventing the noise, vibrations, and emissions, and failure to do so constituted an unreasonable interference with appellees’ peaceful enjoyment, use, and occupation of their home. The noise, vibrations, and noxious emissions were found to constitute a nuisance on the authority of *Nitram Chemicals, Inc. v. Parker*, 200 So.2d 220 (Fla. 2d DCA 1967), *cert. denied*, 204 So.2d 330 (Fla. 1967), and *City of Lakeland v. Douglass*, 143 Fla. 771, 197 So. 467 (1940). The judge found that the damage to the residence is permanent, entitling [Plaintiffs] to the diminution or depreciation of the value of the property caused by the nuisance. 66 C.J.S. *Nuisances* § 175 (1950).” “Finally, the judge concluded that the noise and vibrations through the air and ground, and the sulphurous gas emissions, caused personal injury to each of the appellees in varying severity, appellees having suffered damages due to annoyance, discomfort, inconvenience, and sickness during the times of their exposure to those conditions

[citing the authority of] *Nitram Chemicals, Inc.*” *Exxon Corp., U.S.A. v. Dunn*, 474 So. 2d 1269, 1271- 1273 (Fla. 1st DCA 1985).

25. On January 30, 2022, one of the Plaintiffs went to the City of Dania Beach to complain about the extremely loud sound coming from the New Power Plant but the city officials told him “there is nothing we can do” and sent him to Broward County. Once he got to Broward County, he talked to Gerald Henry who would not take a report about the extreme noise coming from the New Power Plant and told Plaintiff to try to talk to someone else because there is nothing he can do.

26. In February 2022 the New Power Plant sound level was reduced for the nighttime and turned up to extremely loud during the day and Plaintiffs were finally able to get some sleep but still suffered during the day from the noise coming from the Plant. *Id.*

27. On or around February 13, 2022, the sound of a large explosion from the New Power Plant shook Plaintiffs’ homes once again igniting the fear for life and property in Plaintiffs. *Id.* “[N]eighbors have a common law duty not to interfere with, or to render each other unsafe or insecure in life.” *See Windward Marina, L.L.C. v. City of Destin*, 743 So. 2d 635, 639 (Fla. 1st DCA 1999) (citing *Prior v. White*, 132 Fla. 1, 180 So. 347, 355 (Fla. 1938)).

28. The New power Plant continued to operate loudly during the day and continued to randomly release steam producing extreme levels of noise the day and night torturing Plaintiffs.

29. On or about August 10, 2022, loud whistling started on top of the already loud noise emitted by the New Power Plant and went on all day and all night producing 65 decibels of sound level on Plaintiffs properties that lasted until August 28, 2022, when a sound of an explosion shook Plaintiffs homes at 10:15 P.M. after which the whistling stopped the next day. The two United States Supreme Court cases of *United States v. Causby*, 328 U.S. 256, 66 S. Ct.

1062, 90 L. Ed. 1206, and *Griggs v. Allegheny County*, 369 U.S. 84, 82 S. Ct. 531, 7 L. Ed. 2d 585 (1962) “in substance held that noise can be a nuisance” which holding was adopted by the Fla. 1st DCA: “the land owner has a right to be free from unreasonable interference caused by the noise, and if such noise and/or intense vibration produced . . . deprived such owner of an essential element in his relationship to his land, compensation therefore should be made.” *City of Jacksonville v. Schumann*, 199 So. 2d 727, 729 (Fla. 1st DCA 1967). *See* communication between Plaintiffs and FPL’s representative Tammy Richards and Nathan Netherton attached hereto as Exhibit “L.”

30. On September 14, 2022, the New Power Plant got extremely loud, and Plaintiffs emailed Nathan Netherton at 12:36 A.M. to ask what is going on and why is the Plant extremely loud? Mr. Netherton responded that that a failed seal was the cause and told Plaintiffs the repair might take until October 15, 2022, meaning no sleep and no rest for a month for Plaintiffs. By the time FPL repaired the problem causing the extreme noise it was November 3, 2022, and Plaintiffs were again deprived from the use and enjoyment of their property for about six weeks. *Id.* *See* communication between Plaintiffs and FPL’s plant manager Nathan Netherton attached hereto as Exhibit “M.”

31. On or around November 24, 2022, the new Power Plant was up and running again and it was loud again keeping Plaintiffs from sleeping during the night and causing conversations to turn into yelling contest during the day and FPL is continuing to deprive Plaintiffs from the use and enjoyment of their property which is their home sweet home. *Id.*

32. Based on all of the facts mentioned above, there can be no doubt that Plaintiffs can show competent and substantial evidence to establish that FPL’s conduct was and continues to be nuisance. “There is ‘no exact rule or formula’ for deciding when a neighbor’s noise rises to

the level at which a court will grant relief. *See Rae*, 690 So. 2d at 1343. Rather, courts evaluate nuisance actions by considering the “reasonableness of the use, ‘as such use affects the . . . private rights of others . . . [as] determined from the facts and circumstances of particular cases.’” *Saadeh v. Stanton Rowing Found. Inc.*, 912 So. 2d 28, 29, 31 (Fla. 1st DCA 2005) (quoting *Cason v. Fla. Power Co.*, 74 Fla. 1, 76 So. 535, 536 (Fla. 1917)). “The application of common law nuisance standards mostly ‘presents an evidentiary issue’ where a factfinder’s conclusions must be supported by competent, substantial evidence.” *See Clark*, 226 So. 3d at 283.

CLASS REPRESENTATION ALLEGATIONS

33. Plaintiffs, Louis S. Toll and Stacy S. Toll seek class certification pursuant to Florida Rules of Civil Procedure 1.220 relating to the claim of Common Law nuisance for which they seek relief for damages. This class is defined as: “All individuals living in the 1/3-mile radius (around 540 yards) of FPL’s Dania Beach Power Plant, who suffered the same harm as the named Plaintiffs resulting from FPL’s conduct.” This Class is referred to as the “Most Affected Class.” *See* image of map with affected area circled attached hereto as Exhibit “N.”

34. Class action is the only practicable means by which Plaintiffs and known and unknown members of the Most Affected Class can seek relief for damages due to the large number of known and unknown Plaintiffs.

35. Besides the named Plaintiffs there are fifty-three additional known potential plaintiffs.

36. The named Plaintiffs and the fifty-three known potential plaintiffs live within a 1/3-mile radius of FPL’s power plant and raise the same common claim of Common Law Nuisance at the time of the filing of this Complaint:

LOUIS S. TOLL,
STACY S. TOLL,
BERKAN ESMER,
LISA ESMER,
SHIARA ARULPRAASAM,
WESLEY W. TOLE, III,
DANIEL RUSSEL,
MICHELLE NEIFELD,
SHAWN NEIFELD,
JACK CROSS,
TRICIA L. CROSS,
VY DIHN-HUYEN GHUYEN,
ROBERT DAVID OSTROV,
DAWN BEACH,
RONALD BEACH,
EDDY PASCAL HOSTE,
JANE QUATROMONI,
COREY MICHAEL MAXWELL,
FRANCES ANNE MAXWELL,
WENDY SHAWN,
WILLIAM RUNNEBAUM,
LILLIAN ROSE RUNNEBAUM,
JOHN J. McNALLY,
SHARON I. McNALLY,
ISRAEL P. RAMASWAMY,
RONALD B. DOUGLAS,
CHRISTINE U. DOUGLAS,
CARLOS ALBERTO MENDEZ,
JEFFREY S. SCOTT,
CHRISTOPHER HARVEY,
JESSICA FRANKS HARVEY,
TABITHA BRANCH,
DAVID NAHUM ,
MARIA NAHUM,
MICHAEL KANE,
MICHAEL V. VERGER,
PATRICIA GIOVANA VERGER,
PAUL PAULHEIM,
CEILAN RODRIGUEZ,
SCOTT T. SMITH,
WILLIAM ROBERT DUNASKE,
GREGORY G. GALYO,
LINDA M. GALYO,

PHILLIP D. HOYT,
LISA R. HOYT,
RICHARD CANBY,
TERESA CANBY,
MAURO VILLA on behalf OF SUN PIER 4501,
ROBERTO BOUZO,
BARABARA SAMARITANI,
DAVIDE VILLA,
LEONARDO VILLA,
VANESSA OSTROV,
YAIME CHAVIANO GIL,
JENNIFER BOUJOUKOS.

See the signed Written Declaration of the fifty-three potential Plaintiffs attached hereto as Exhibit "O."

37. Rule 1.220 Class Action (a)(1) requires "the members of the class [must be] so numerous that separate joinder of each member is impracticable." This action already has fifty-five (55) known potential Plaintiffs residing in about forty homes. The number of affected homes can be around 100-200 and the number of affected people can be up to five hundred or more. Because the number of known members of the proposed Most Affected Class is already fifty-five (55) combined with the fact that a lot of these members are elderly and financially unable to maintain a separate cause of action against FPL, separate joinder of each member is impracticable and class action is the favorable and efficient way to represent all of the affected people. Fla. R. Civ. P. Rule 1.220 Class Action (a)(1).

38. Fla. R. Civ. P Rule 1.220 Class Action (a)(2) requires "the claim or defense of the representative party raises questions of law or fact common to the questions of law or fact raised by the claim or defense of each member of the class." Plaintiffs Louis S. Toll and Stacy S. Toll raise the claim of Common Law Nuisance which is based on FPL's conduct, consisting of but not limited to; fear for life and property, release of fuel fumes for months, making loud to

extreme loud noise day and night on the property close to all Class member's homes for over three years. Therefore, the question of law of fact "has FPL's conduct caused injury, continues to cause injury and loss of property value to the class members under Common Law Nuisance" is a common question of law or fact raised by all members of the Most Affected Class. Therefore, the requirement of Rule 1.220 (a)(2) that the claim or defense of the representative party raises questions of law or fact common to the questions of law or fact raised by the claim or defense of each member of the class is clearly met.

39. Rule 1.220 Class Action (a)(3) requires "the claim or defense of the representative party is typical of the claim or defense of each member of the class." Plaintiffs Louis S. Toll and Stacy S. Toll live within a 1/3-mile radius of FPL's power plant like all of the members of the Most Affected Class and suffered the same injury as the members of the Class from the actions of FPL. Named Plaintiffs and the members of the Most Affected Class endured fear for life and property from explosions and fire, suffered from fuel fumes for months, suffered from loud to extremely loud noise day and night for more than three years and suffered loss of property value just like all other members of the Most Affected Class therefore, their claim is typical of the claim raised by all members of the Most Affected Class. The claim by named Plaintiffs is Common Law Nuisance which is typical and in fact the same as the Common Law Nuisance claim raised by each known member of the Most Affected Class. *See Exhibit "O."*

40. Rule 1.220 Class Action (a)(4) requires "the representative party can fairly and adequately protect and represent the interests of each member of the class." Plaintiffs Louis S. Toll and Stacy S. Toll were and are the most actively involved Plaintiffs amongst the known potential Plaintiffs and likely have the most evidence and knowledge about the claim to prove the common claim of Common Law Nuisance raised by all members of the Most Affected Class.

The fifty-five named and known potential Plaintiffs communicated with each other and agreed that the named Plaintiffs can fairly and adequately protect and represent the interest of each member of the Most Affected Class. *See* Exhibit “O.”

41. Plaintiffs undersigned attorney is member of the Florida Bar in good standing and has successfully represented both plaintiffs and defendants in dozens of lawsuits and has the knowledge and experience to provide proper representation for the members of the Most Affected Class.

42. Based on the foregoing the prerequisites of Rule 1.220 (a) are met.

43. The claim Common Law Nuisance by the named Plaintiffs is maintainable because the prosecution of separate claims by each individual members of the Most Affected Class would create a risk of inconsistent or varying verdicts/results for each individual members of the class establishing incompatible standards of conduct for FPL as the defending party. Therefore, class action is the most favorable and efficient way to resolve Plaintiffs claims and FPL's defenses. Florida Rules of Civil Procedure, Rule 1.220 Class Action (b)(1)(A).

44. All conditions precedent to the bringing of this action have occurred or have otherwise been waived.

45. If Plaintiffs prevail on their claim, they respectfully request the Court to award them the costs of litigation and associated attorney's fees.

46. The Plaintiffs hereby demand a Trial by Jury in this matter for all matters so triable.

WHEREFORE, Plaintiffs Louis S. Toll and Stacy S. Toll respectfully ask the Court to certify the Most Affected Class, enter Judgement for Plaintiffs awarding compensation for their

injury and loss of property value resulting from FPL's conduct and grant all other relief deemed just and proper by the Court.

CERTIFICATE OF SERVICE

I certify that arrangements have been made to deliver a true and correct copy of the summons and Complaint to Defendant FLORIDA POWER AND LIGHT COMPANY.

February 19, 2023.

Respectfully submitted.

The Legal Way, P.A.
Representing Plaintiffs
1835 E. Hallandale Beach Blvd.
Suite 872, Hallandale Beach, FL-33009.
Phone: 954-816-8155

/s/ Balazs Vigh

BALAZS VIGH, ESQ.

Florida Bar No. 1031540

balazs@thelegalway.us

For Service of Documents Only:

eservice@thelegalway.us

EXHIBIT “A”



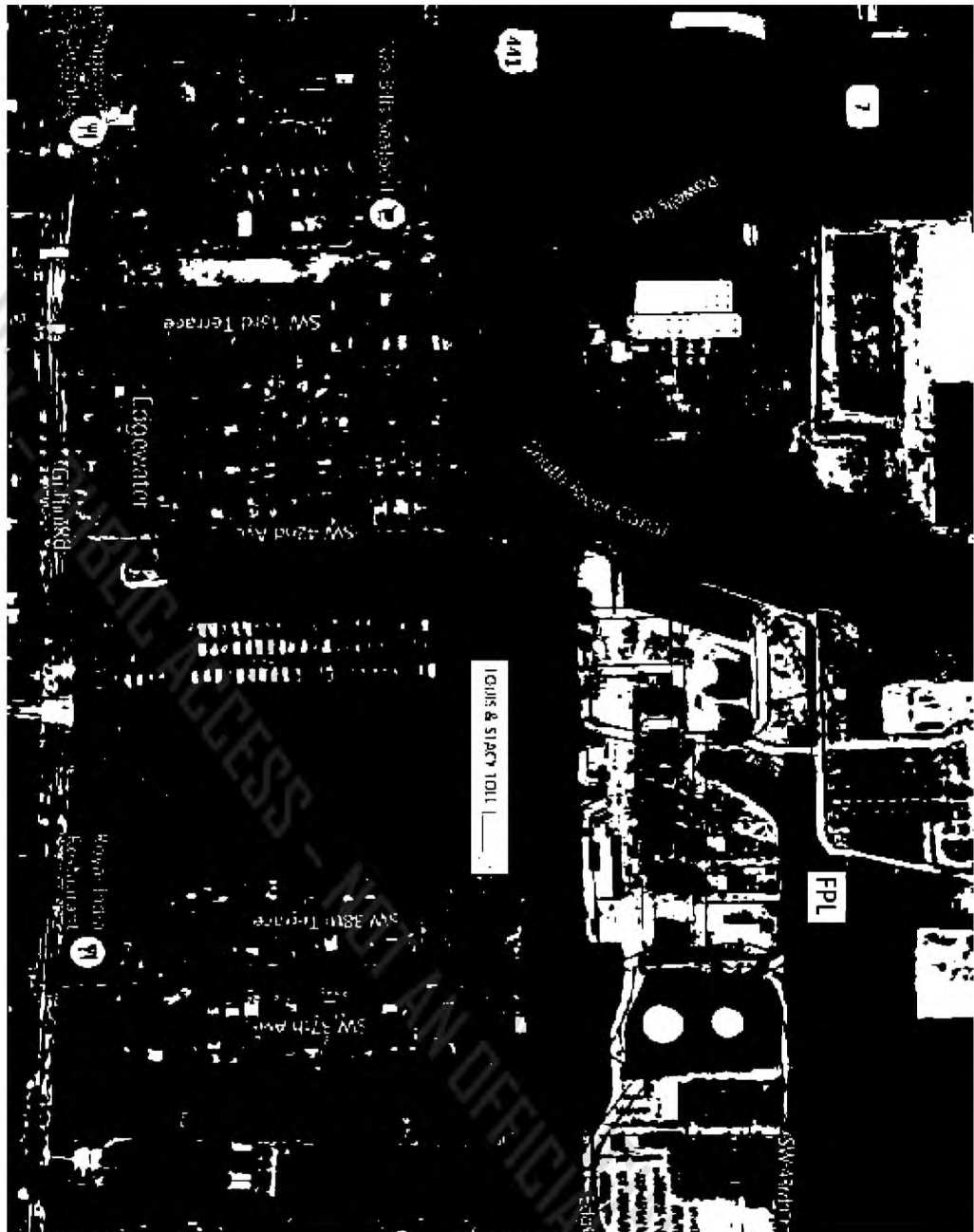


Exhibit "A" Page 2 of 3



Dania Cut-off Canal

4407		4406		4407	4400	4406
LOUIS & STACY TOLL		SW 38 TERRACE	4412	4413	SW 37 AVENUE	4412
4417			4434	4417		4416
4421				4433		4418
4465				4449		4448
4481				4465		4464
4495				4481		4480
4517				4497		4496
				4499		4512

EXHIBIT “B”

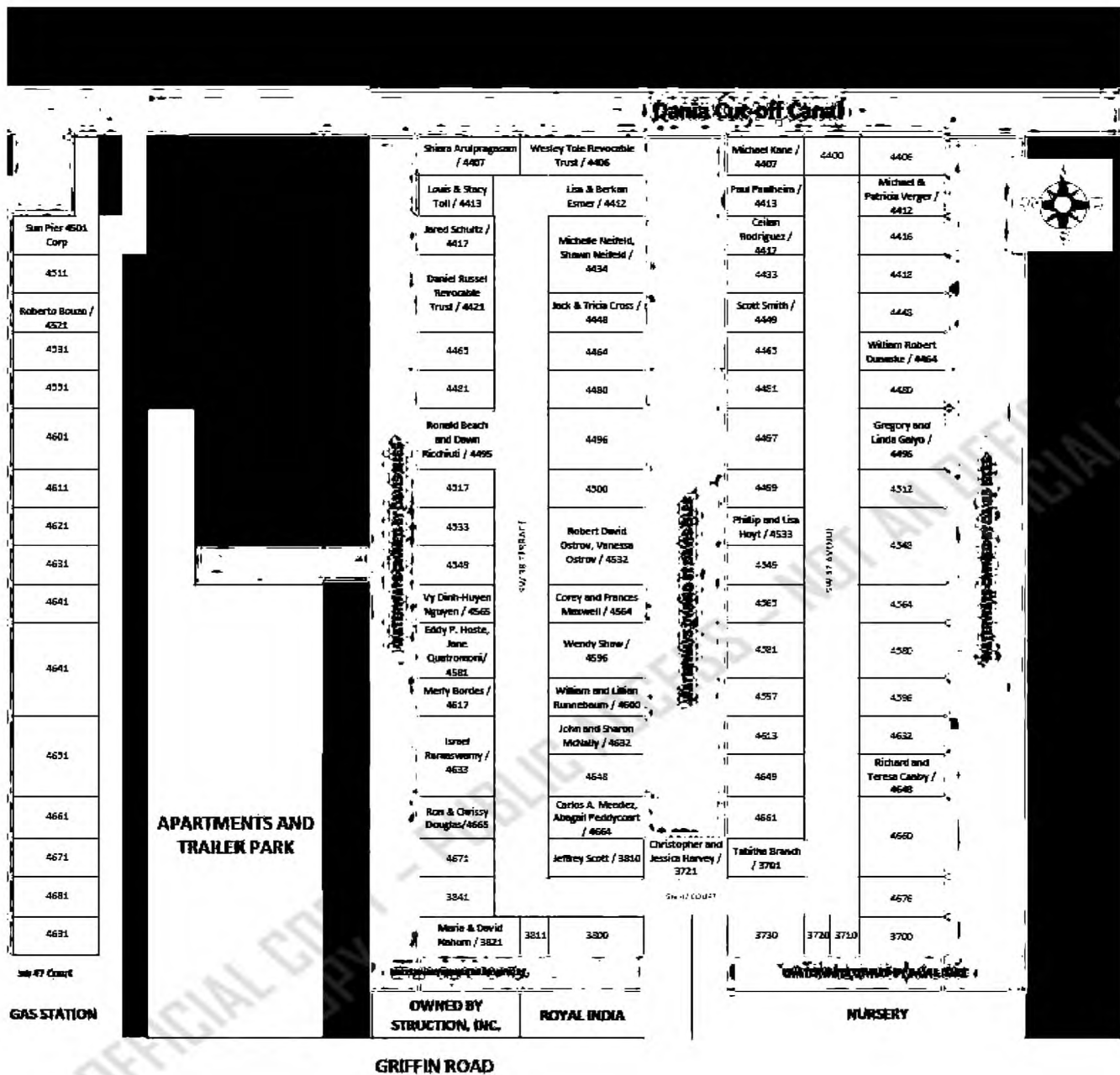


EXHIBIT “C”



Exhibit "C" Page 1 of 2



EXHIBIT “D”

EXHIBIT "D"



Meeting Minutes

Date: June 21, 2017

Place: Patrick Meli Park Community Center

Time: 7:00pm

Meeting started with Pledge Allegiance

Airport update- Dick Pfenniger

- Noise meeting was held 6-11-17
- Progress or lack of was talked about
- Appears that noise is not considered in the 150 study but Environmental issues are
- # of flights the same since 2009 # passengers up as bigger planes used
- 80% of the high noise events are in our area

FPL Speakers –Tammy Richards and Jackie Kingston

- New plans for power plant behind our neighborhood will tear down old and put up new projected to end 2022
- 1Unit 50% less equipment green space and 2 stacks instead of 4 natural gas and oil will use existing pipeline
- Work hours 8-5 Monday through Friday some Saturdays for 2-2 ½ years
- Plant trees to cover the building new plant will be much quieter
- For updates contact the web site FPL.COM/DANIABEACHENERGY

Treasurer's report

- Dues of 100 were collected this year record 44 homes paid
- Cash flow summary April 2016-June 2017
- Beginning balance April 2016 4404.15
- Deposits 4900.00
- Expenditures FPL 394.34 Sunbiz 131.25
- H2O2186.15 Back Flow 123.00
- Lawn 1440.00 Misc. 78.21
- TOTAL Expenditures 4352.95 Ending Balance 4951.20



BSO Safety Report

- School is out kids may be bored. Be aware and look out. There was a break in on 38th all appliances were taken however they feel it was an inside job.

Mosquito Season

- Control will hopefully start spraying call them 954-763-4062
- Larvae tablets were put in the drains

Hurricane Season has begun

- Be mindful of cleaning us yards, trim trees now, be prepared

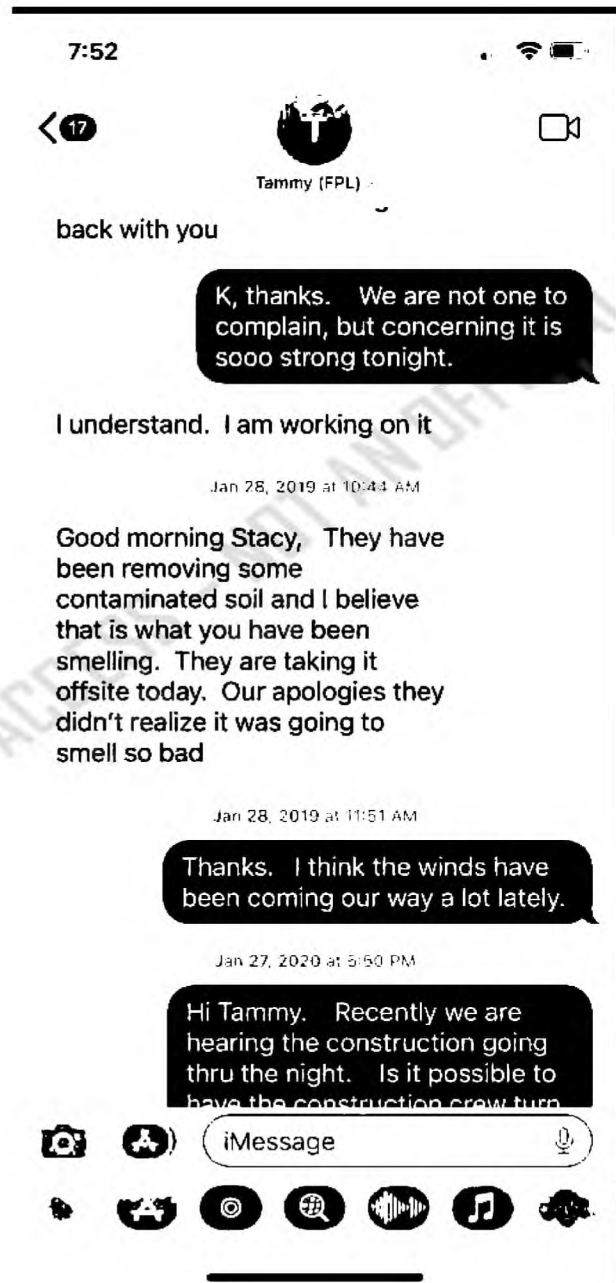
Congratulations

- Shea and Carlos on getting married
- Dennis and Joanne on being grandparents again
- Jane and Eddy on Jane's new Grand son

Will Plan another Happy hour soon info to follow

Meeting ended 8pm

EXHIBIT “E”



Communications between Michel Fortin (prior neighbor) and Stacy Toll

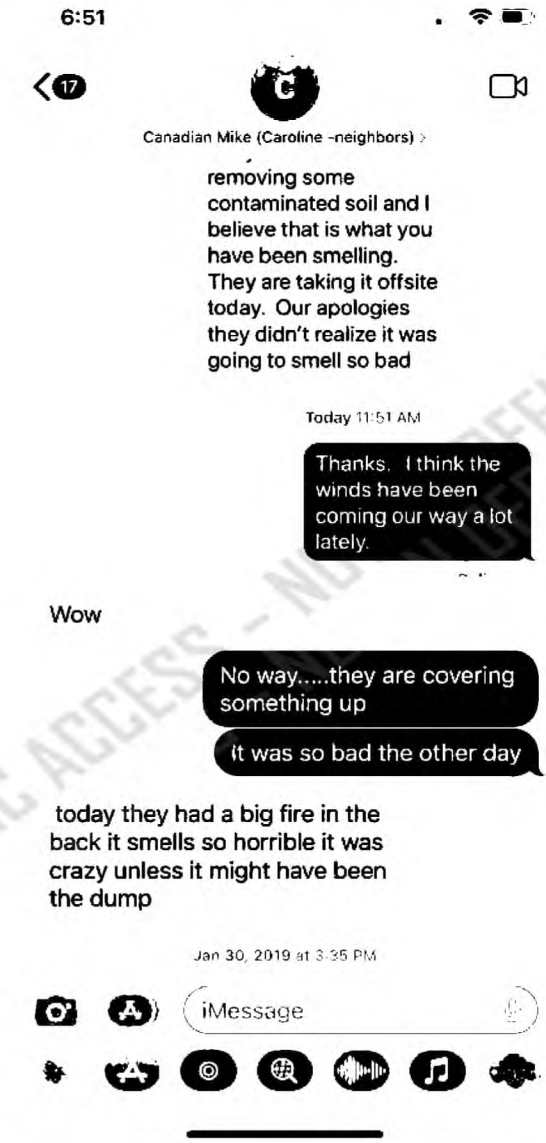
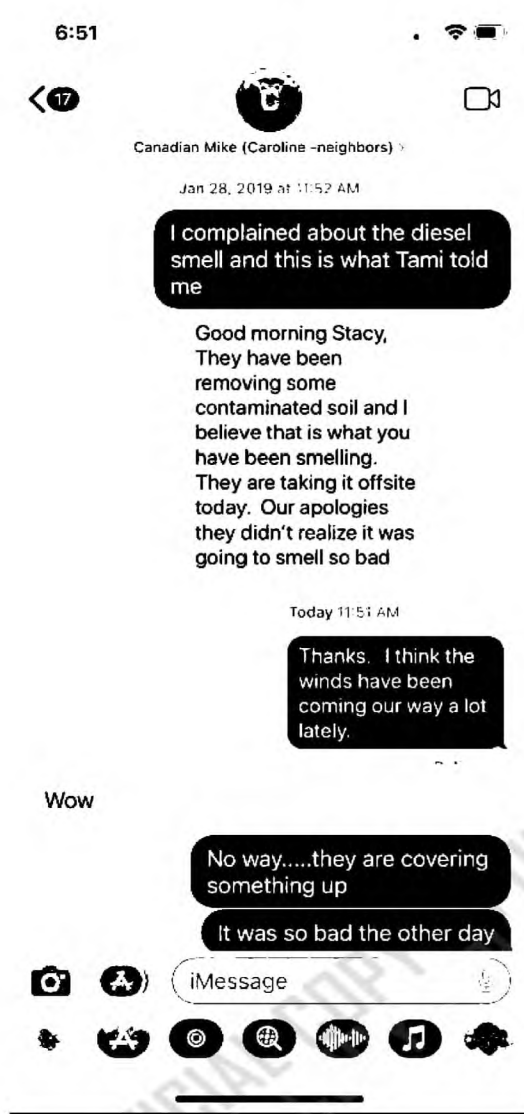


EXHIBIT “F”

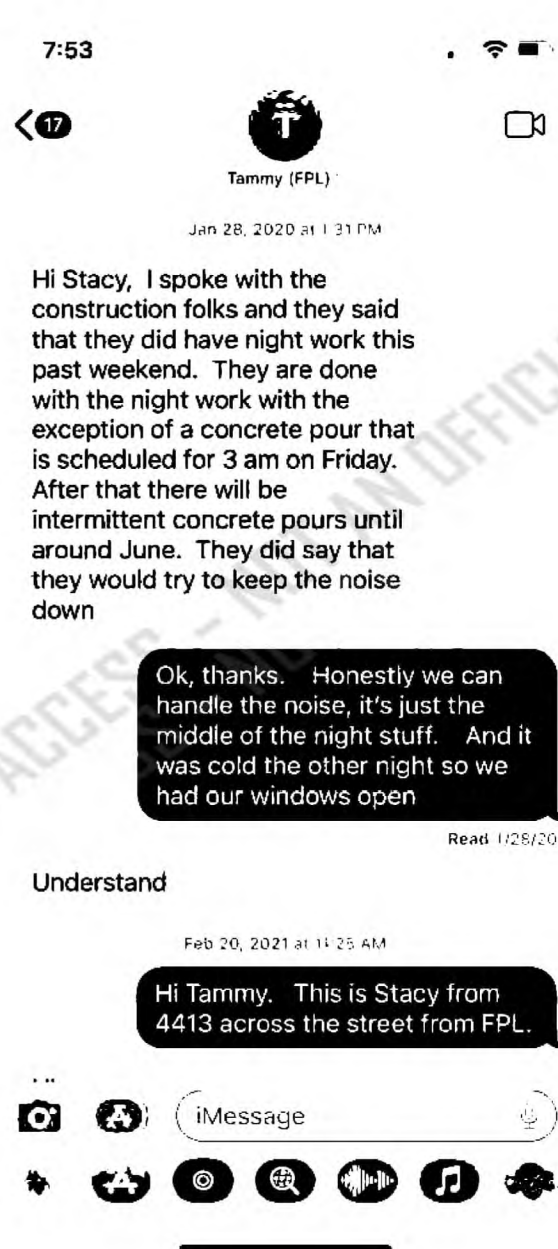
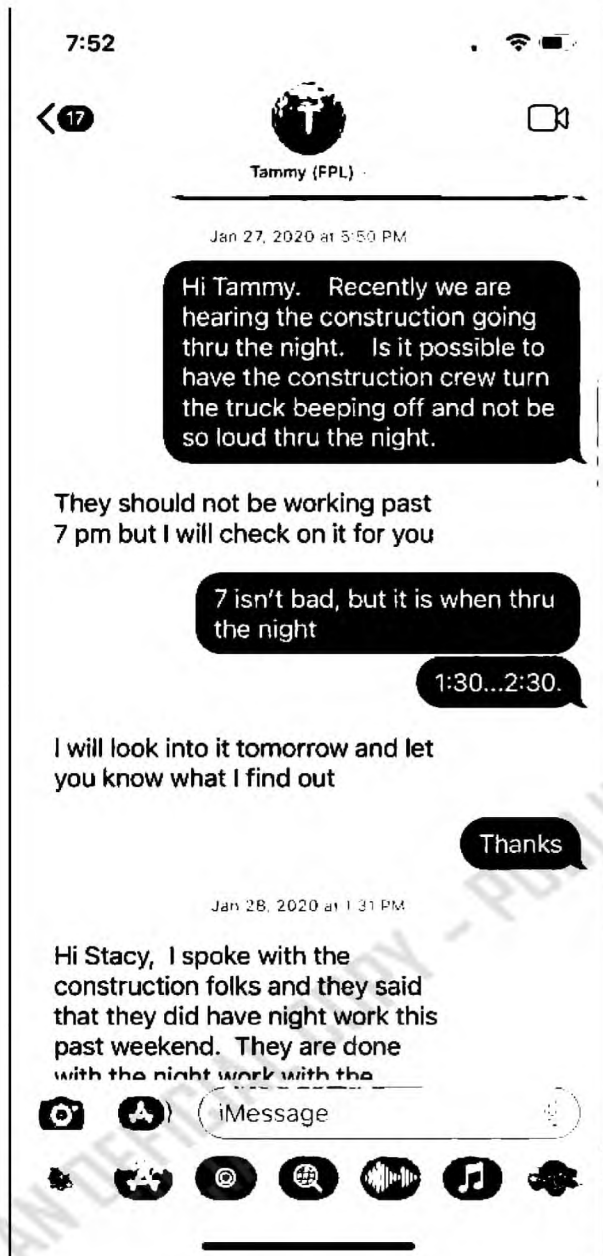


EXHIBIT “G”

Highlighted communications between Michel Fortin (prior neighbor) and Tammy Richards (forwarded to Stacy Toll)



EXHIBIT “H”



EXHIBIT “I”



Canadian Mike (Caroline -neighbors) >

Mar 2, 2021 at 5:32 AM

Beep beep beep beep beep

Mar 2, 2021 at 6:56 AM

f***** drives me crazy

445d woke me up I had to go
and sleep in the living room

Mar 3, 2021 at 8:02 PM

 5 Photos



I'm working 3 days a week at



EXHIBIT “J”

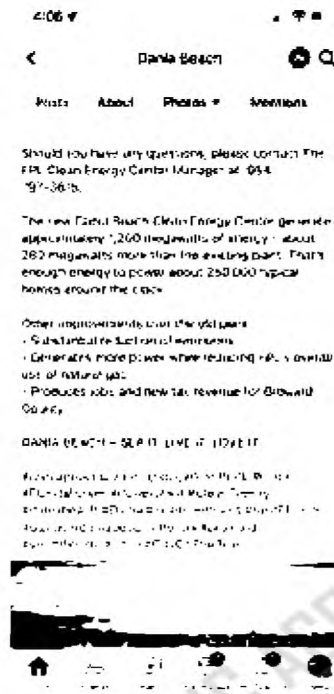
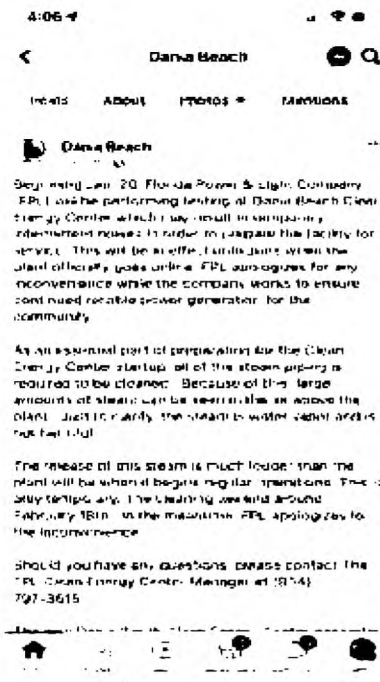


Exhibit "J" Page 1 of 3

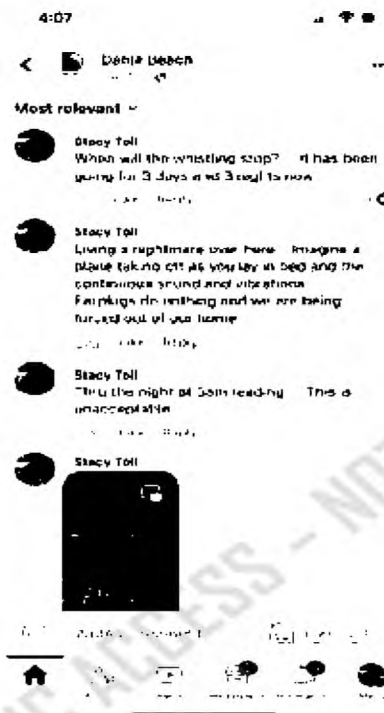


Exhibit "J" Page 2 of 3

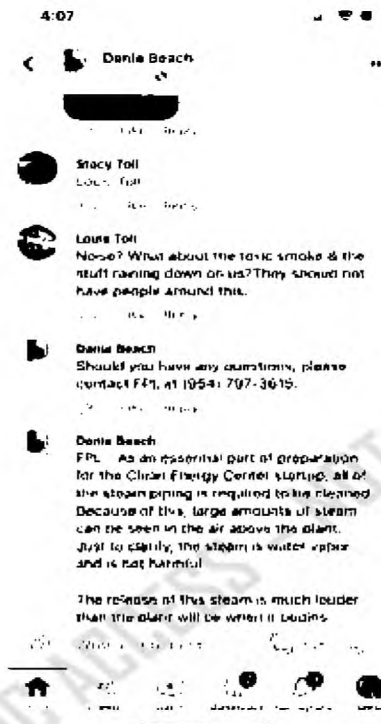
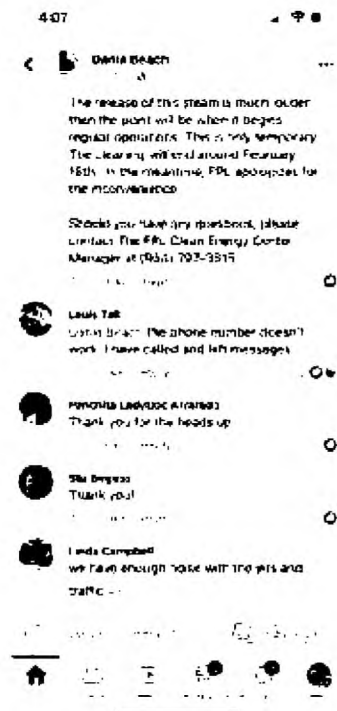
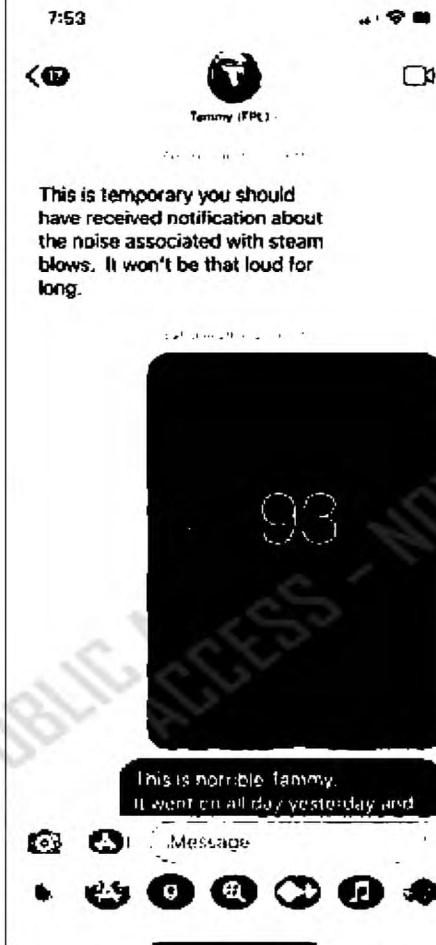
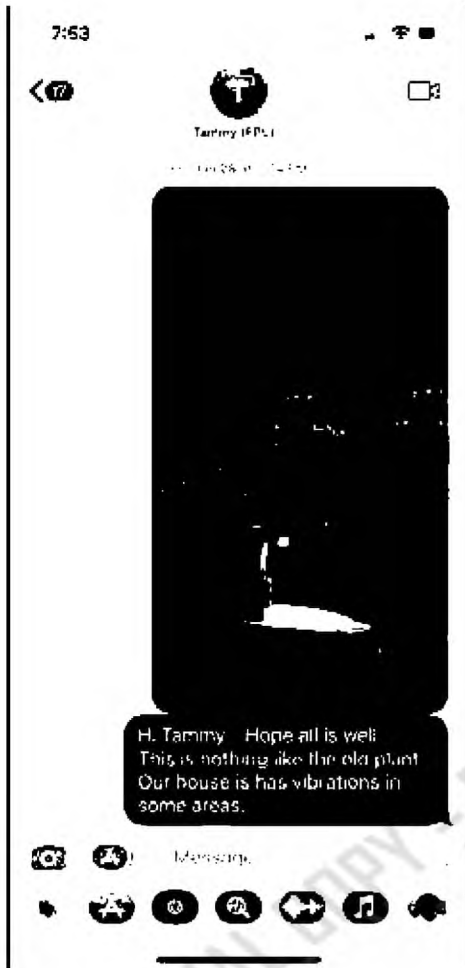


Exhibit "J" Page 3 of 3

EXHIBIT “K”



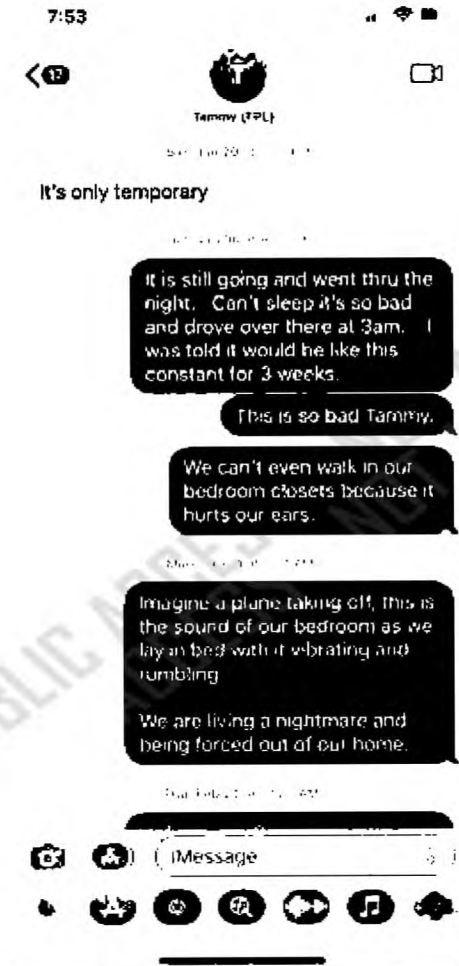
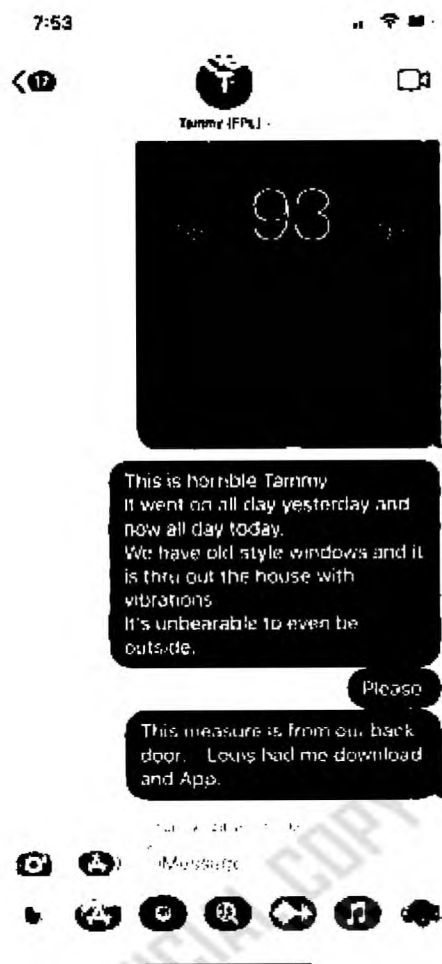


EXHIBIT “L”

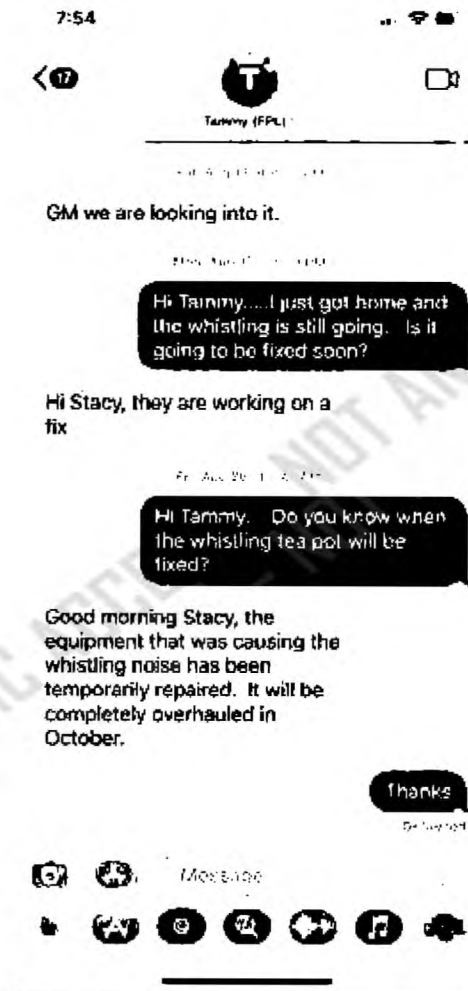
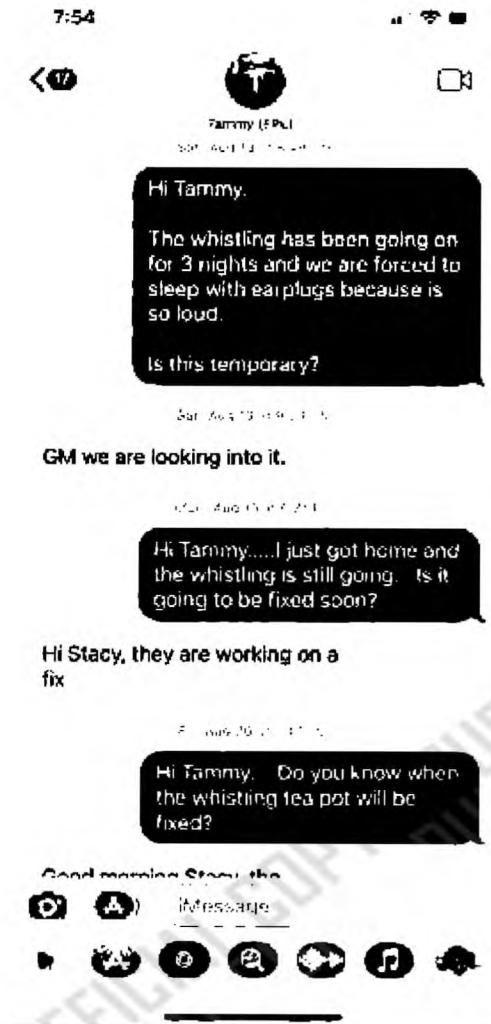











EXHIBIT “M”



RE: Dania Beach FPL Beast

 **Netherton, Nathan** (Nathan.Netherton@fpl.com)







Good afternoon







We failed a seal and are working the repair plan. Hope to have it done by the weekend

From: Stacy Tall <stacytall@fpl.com>
Sent: Wednesday, September 14, 2022 12:36 AM
To: Netherton, Nathan <Nathan.Netherton@fpl.com>
Subject: Dania Beach FPL Beast

H. Netherton - One is pretty loud tonight

Sent from my iPhone

















RE: Dania Beach FPL Beast



 **Netherton, Nathan** (Nathan.Netherton@fpl.com)




Apologize but the repair appears to have failed. We are working to do everything we can to reduce the noise. We will have everything needed to perform the permanent repair on 10/15 but are working to find possible solutions to reduce the impact until then

From: Stacy Tall <stacytall@fpl.com>
Sent: Thursday, September 29, 2022 8:19 PM
To: Netherton, Nathan <Nathan.Netherton@fpl.com>
Subject: Re: Dania Beach FPL Beast

Whew... breaking out the earplugs tonight!!!

Sent from my iPad

On Sep 20, 2022, at 8:10 PM, Netherton, Nathan <Nathan.Netherton@fpl.com> wrote:

Exhibit "M" Page 1 of 3







 More...



RE: Dania Beach FPL Boost




 **Netherton, Nathan** (Nathan.Netherton@fpl.com)
 Sent: Friday, October 7, 2022 9:45 AM
 To: 'Netherton, Nathan' <Nathan.Netherton@fpl.com>
 Subject: RE: Dania Beach FPL Boost

Received: 10/07/2022 09:45:00 AM

Good morning,






It is a challenge we just shut down this unit and plan to try and restart it later until we can begin repairs on 10/15. Hopefully the weather will allow us to not have to start it back up.

Hopefully we will have the pressure off the unit this morning which should stop the noise up as it is required to run again.

I appreciate your patience in this.

From: Stacy Toll <stacytoll@fpl.com>
 Sent: Friday, October 7, 2022 9:45 AM
 To: Netherton, Nathan <Nathan.Netherton@fpl.com>
 Subject: RE: Dania Beach FPL Boost


Hi Nathan
 It is a pain of course. I'm thinking the Beast is beating the A planes.
 Sent from my iPhone






 More...



RE: Dania Beach FPL Boost




 **Netherton, Nathan** (Nathan.Netherton@fpl.com)
 Sent: Friday, October 7, 2022 9:45 AM

Received: 10/07/2022 09:45:00 AM

Good morning,

The team found a valve that was stuck open and it is now closed. I apologize for it taking so long for them to correct it.

From: Stacy Toll <stacytoll@fpl.com>
 Sent: Thursday, November 3, 2022 5:55 AM
 To: Netherton, Nathan <Nathan.Netherton@fpl.com>
 Subject: RE: Dania Beach FPL Boost

Hi Nathan. She is pretty loud. Please let me this this temporary.

It's torture over here what we go thru and hear every bit of noise inside our house because we have ple windows. 🙄

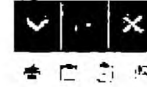
Sent from my iPhone

Exhibit "M" Page 2 of 3











Re: Danis Beach FPL Beest

 **Stacy Toll** (stacy.toll@fpl.com)

 Nathan (nathan@fpl.com)

 **Netherton, Nathan** (nathan@fpl.com)

Hi Nathan,

It is a hell lot better than the we plant and we are a free us every morning. I try to put a plan how can my friend Phil doesn't work and then he forced to wake up. The police is asking for the we plant.

We can't even enjoy outside any more because our conversation is a normal of getting.

Did something break again because we can't live like this anymore.

Send from my iPhone

On Nov 11, 2022, at 2:30 PM, Netherton, Nathan (nathan@fpl.com) wrote:

Exhibit "M" Page 2 of 3

EXHIBIT “N”

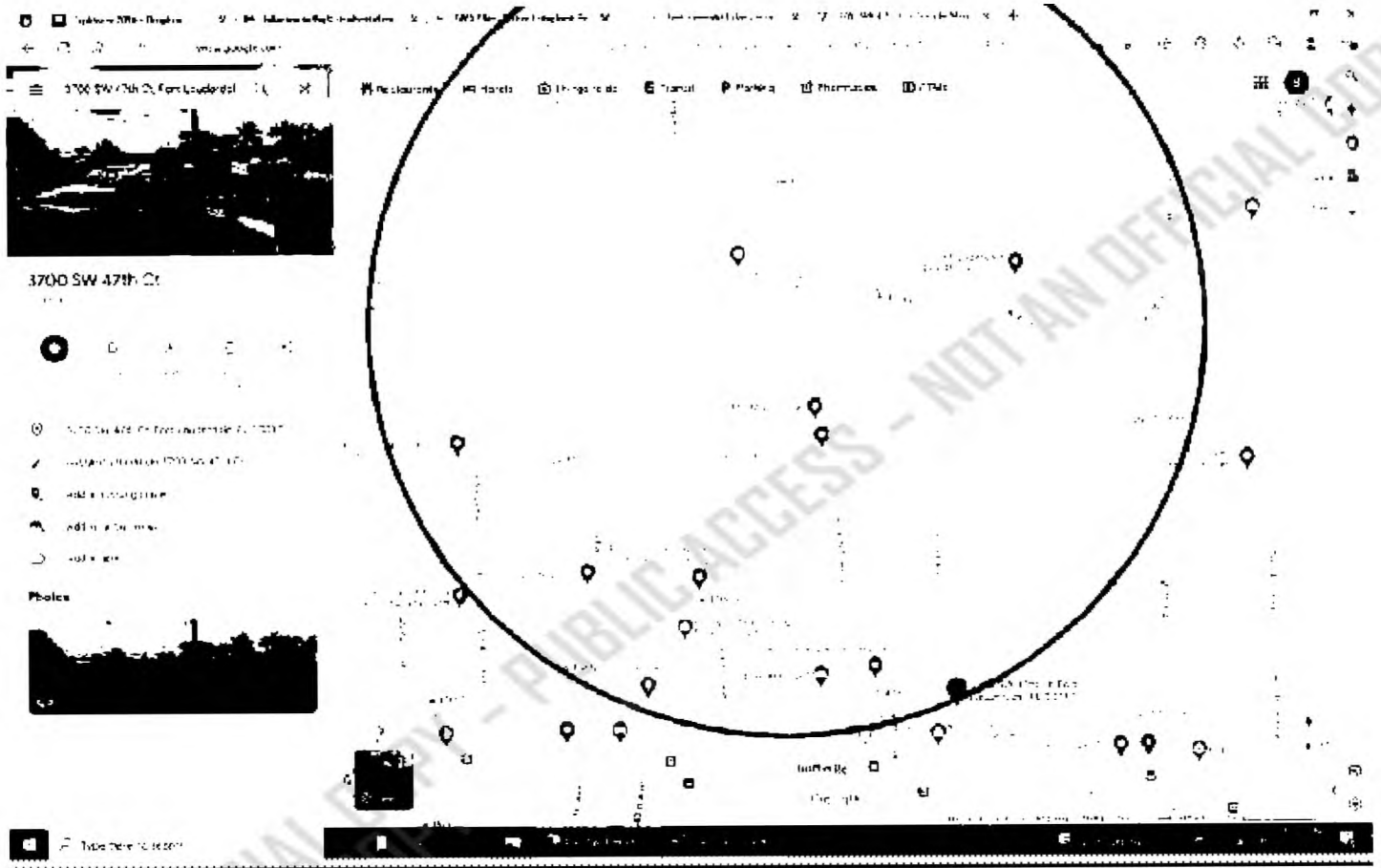


EXHIBIT “O”

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by BERKAN ESMER:

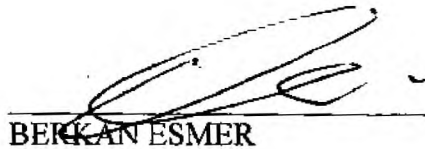
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4412 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: FEB 11/2023



BERKAN ESMER

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by LISA ESMER:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4412 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: FEB 11 / 2023



LISA ESMER

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by SHIARA ARULPRAGASAM:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4407 SW 38 Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/23



SHIARA ARULPRAGASAM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

_____ /

WRITTEN DECLARATION

The following is a written declaration by WESLEY W. TOLE, III as Trustee:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4406 SW 38th Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

WESLEY W. TOLE, III REVOCABLE TRUST
u/a dated September 1, 2015

BY: _____



Wesley W. Tole, III,
As Trustee
Individually and as Trustee

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by DANIEL RUSSELL, as Trustee:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4421 SW 38th Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/2/2023

DANIEL RUSSELL REVOCABLE TRUST
u/a dated June 19, 2020

BY: _____

Daniel Russell,
As Trustee

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by MICHELE NEIFELD:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4434 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/9/2023


MICHELE NEIFELD

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by SHAWN NEIFELD:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I reside in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is 4413 SW 38th Terrace, Dania Beach, Florida 33312.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/14/2023


SHAWN NEIFELD



IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by JACK CROSS:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4448 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/11/2023


JACK CROSS

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by TRICIA CROSS:

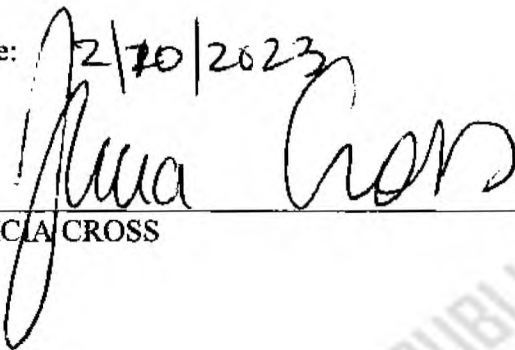
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4448 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

2/10/2023


TRICIA CROSS

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by VY DINH-HUYEN GHUYEN, individually and as Trustee:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4565 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

Page 1 of 2
Vy Din-Huyen Ghuyen

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

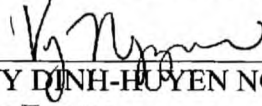
7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

VY DINH-HUYEN NGUYEN REVOCABLE
TRUST u/a Dated September 15, 2016

BY:


VY DINH-HUYEN NGUYEN,
As Trustee


VY DINH-HUYEN NGUYEN

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by ROBERT DAVID OSTROV:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4532 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 02/11/2023


ROBERT DAVID OSTROV

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by DAWN BEACH:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4495 SW 38th Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/23


DAWN BEACH

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by RONALD BEACH:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4495 SW 38th Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

2-7-2023



RONALD BEACH

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by EDDY PASCAL HOSTE:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4581 SW 38th Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.


PAGE ONE OF TWO

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/17/2023



EDDY PASCAL HOSTE

PAGE TWO OF TWO


IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by JANE QUATROMONI:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I live in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4581 SW 38th Terrace, Dania Beach, Florida 33312.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/13/2023



JANE QUATROMONI

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

_____ /

WRITTEN DECLARATION

The following is a written declaration by COREY MAXWELL:

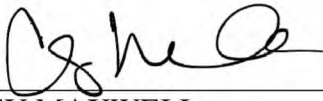
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4564 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/2023

A handwritten signature in black ink, appearing to read 'Corey Maxwell', is written over a horizontal line.

COREY MAXWELL

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

_____ /

WRITTEN DECLARATION

The following is a written declaration by FRANCES MAXWELL:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4564 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by WENDY SHAW:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4596 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/2023


FRANCES MAXWELL

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: February 10, 2023

Wendy Shaw
WENDY SHAW

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by WILLIAM RUNNEBAUM:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4600 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/12/2023


WILLIAM RUNNEBAUM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by LILLIAN RUNNEBAUM:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4600 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/12/2023


LILLIAN RUNNEBAUM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by JOHN MCNALLY:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4632 SW 38th Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.


Page 1 of 2
John McNally

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2-13-23



JOHN MCNALLY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by SHARON MCNALLY:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4632 SW 38th Terrace, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/13/2023

Sharon McNally 2-13-23
SHARON MCNALLY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by ISRAEL P. RAMASWAMY:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4633 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/8/23



ISRAEL P. RAMASWAMY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by RONALD DOUGLAS:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4665 S.W. 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 02/07/23


RONALD DOUGLAS

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by CHRISTINE DOUGLAS:

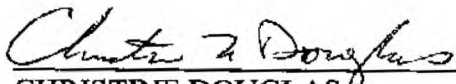
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4665 S.W. 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/2023


CHRISTINE DOUGLAS

Page 2 of 2
Christine Douglas

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

_____ /

WRITTEN DECLARATION

The following is a written declaration by CARLOS ALBERTO MENDEZ:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4664 SW 38th Terrace, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/13/2023

Carlos Mendez
CARLOS ALBERTO MENDEZ

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by JEFF SCOTT:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 3810 SW 47th Court, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

Page 1 of 2
Jeff Scott

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

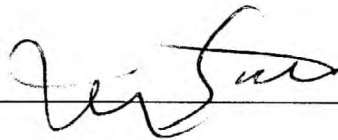
7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

2/09/23

JEFF SCOTT



IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by CHRISTOPHER HARVEY:

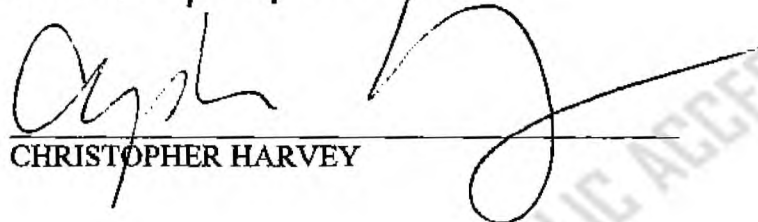
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 3721 SW 47th Court, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 02/16/2023


CHRISTOPHER HARVEY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by JESSICA FRANKS HARVEY:


1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I reside in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is 3721 SW 47th Court, Dania Beach, Florida 33312.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effectuated Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 02/16/2023


JESSICA FRANKS HARVEY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by TABITHA BRANCH:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 3701 SW 47th Court, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/2023



TABITHA BRANCH

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by DAVID NAHUM:

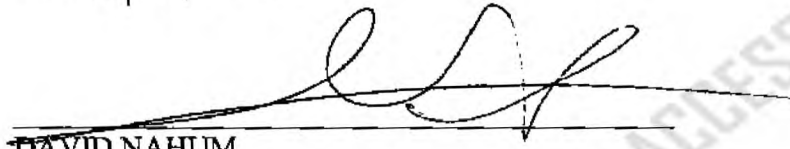
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 3821 SW 47th Court, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/15/2023


DAVID NAHUM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

_____ /

WRITTEN DECLARATION

The following is a written declaration by MARIA NAHUM:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 3821 SW 47th Court, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/15/2023



MARIA NAHUM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by MICHAEL KANE:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4407 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

2/15/2023


MICHAEL KANE

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by MICHAEL VERGER:

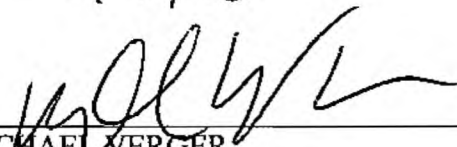
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4412 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/23



MICHAEL VERGER

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by PATRICIA VERGER:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4412 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/7/23



PATRICIA VERGER

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

_____ /

WRITTEN DECLARATION

The following is a written declaration by PAUL PAULHEIM:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4413 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 02/09/2023



PAUL PAULHEIM

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by CEILAN RODRIGUEZ:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4417 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

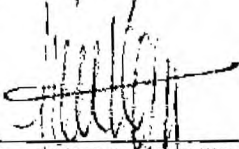
6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

2/10/23



CEILAN RODRIGUEZ

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by SCOTT SMITH:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4449 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/11/2023



SCOTT SMITH

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by WILLIAM ROBERT DUNASKE:

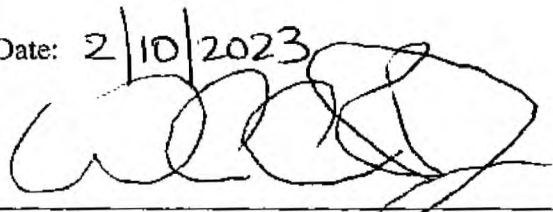
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4464 S.W. 37th Terrace, Dania, Florida 33312.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/10/2023

A handwritten signature in black ink, appearing to read 'William Robert Dunaske', written over a horizontal line.

WILLIAM ROBERT DUNASKE

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by GREGORY G. GALYO:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4496 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/10/2023



GREGORY G. GALYO

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by LINDA M. GALYO:

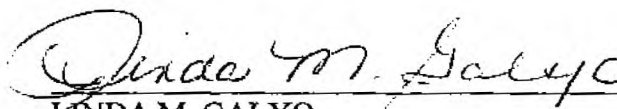
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4496 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/10/2023


LINDA M. GALYO

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by PHILLIP HOYT:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4533 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/20/2023


PHILLIP HOYT

IN THE CIRCUIT COURT OF THE 17th
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by LISA HOYT:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4533 SW 37th Avenue, Dania Beach, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/12/2023


LISA HOYT

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by RICHARD CANBY:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4648 SW 37th Avenue, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:

2/11/2023


RICHARD CANBY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by TERESA CANBY:


1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4648 SW 37th Avenue, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/11/2023


TERESA CANBY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by MAURO VILLA,^{**} as Vice President of SUN PIER 4501
CORP, a Florida corporation: ^{**individually and}

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4501 SW 42nd Avenue, Dania, Florida 33312
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can

competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/10/2023

SUN PIER 4501 CORP, a Florida corporation

BY: 

MAURO VILLA,
As President and individually

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by ROBERTO BOUZO:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I own a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4521 SW 42nd Avenue, Dania, Florida 33314
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date:



ROBERTO BOUZO

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by BARBARA SAMARITANI:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I reside in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4501 SW 42 Avenue, Dania Beach, Florida 33314.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/19/2023



BARBARA SAMARITANI

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by DAVIDE VILLA:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I reside in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4501 SW 42 Avenue, Dania Beach, Florida 33314.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/19/2023



DAVIDE VILLA

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs.

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by LEONARDO VILLA:

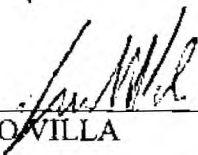
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I reside in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4501 SW 42 Avenue, Dania Beach, Florida 33314.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/19/2023


LEONARDO VILLA

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by VANESSA OSTROV:

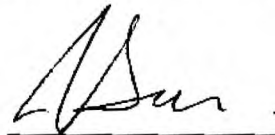
1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I reside in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is 4532 SW 38th Terrace, Dania Beach, Florida 33312.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/17/23



VANESSA OSTROV

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,
v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by YAIME CHAVIANO GIL:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I reside in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is 4521 SW 42nd Avenue, Dania Beach, Florida 33314.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effectuated Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/19/2023



YAIME CHAVIANO GIL

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER:

(CLASS REPRESENTATION)

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

WRITTEN DECLARATION

The following is a written declaration by JENNIFER BOUJOUKOS:

1. I am over the age of eighteen years, and otherwise sui juris.
2. I am a full-time resident of Dania Beach and I live in a house located within a 1/3 mile radius from Florida Power and Light Company's ("FPL") Clean Energy Center power plant.
3. My address is: 4421 SW 38 Terrace, Dania Beach, Florida 33312.
4. I have read the proposed Class Representation Complaint ("Complaint") by Balazs Vigh, Esq.
5. I support the Common Law Nuisance allegations raised in the Complaint because I have suffered the same harm arising from FPL's conduct mentioned in said Complaint.
6. I support the named Plaintiffs LOUIS S. TOLL and STACY S. TOLL in their pursuit of Class Representation against FPL for Common Law Nuisance because I sincerely believe they can competently represent my interest as a potential member of the Most Effected Class mentioned in the Complaint.

6. If the Court does not certify the Most Effected Class mentioned in the Complaint, or some other similar Class, I intend to pursue a Common law Nuisance action against FPL either on my own or by joining an action against FPL.

7. To the best of my ability, I intend to financially support LOUIS S. TOLL and STACY S. TOLL to pay the cost of litigation associated with the Class Action suit against FPL.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THE FACTS STATED IN IT ARE TRUE.

Date: 2/19/2023


JENNIFER BOUJOUKOS

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT/COUNTY COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

Louis S Toll, Stacy S Toll
Plaintiff

Case # _____
Judge _____

vs.

Florida Power & Light Company
Defendant

II. AMOUNT OF CLAIM

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- ☐ \$8,000 or less
☐ \$8,001 - \$30,000
☐ \$30,001- \$50,000
☐ \$50,001- \$75,000
☐ \$75,001 - \$100,000
☒ over \$100,000.00

III. TYPE OF CASE (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

CIRCUIT CIVIL

- ☐ Condominium
- ☐ Contracts and indebtedness
- ☐ Eminent domain
- ☐ Auto negligence
- ☐ Negligence—other
 - ☐ Business governance
 - ☐ Business torts
 - ☐ Environmental/Toxic tort
 - ☐ Third party indemnification
 - ☐ Construction defect
 - ☐ Mass tort
 - ☐ Negligent security
 - ☐ Nursing home negligence
 - ☐ Premises liability—commercial
 - ☐ Premises liability—residential
- ☐ Products liability
- ☐ Real Property/Mortgage foreclosure
 - ☐ Commercial foreclosure
 - ☐ Homestead residential foreclosure
 - ☐ Non-homestead residential foreclosure
 - ☐ Other real property actions
- ☐ Professional malpractice
 - ☐ Malpractice—business
 - ☐ Malpractice—medical
 - ☐ Malpractice—other professional
- ☒ Other
 - ☐ Antitrust/Trade regulation
 - ☐ Business transactions
 - ☐ Constitutional challenge—statute or ordinance
 - ☐ Constitutional challenge—proposed amendment
 - ☐ Corporate trusts
 - ☐ Discrimination—employment or other
 - ☐ Insurance claims
 - ☐ Intellectual property
 - ☐ Libel/Slander
 - ☐ Shareholder derivative action
 - ☐ Securities litigation
 - ☐ Trade secrets
 - ☐ Trust litigation

COUNTY CIVIL

- ☐ Small Claims up to \$8,000
- ☐ Civil
- ☐ Real property/Mortgage foreclosure

- ☐ Replevins
☐ Evictions
 ☐ Residential Evictions
 ☐ Non-residential Evictions
☐ Other civil (non-monetary)

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes ☐ No ☒

IV. REMEDIES SOUGHT (check all that apply):

- ☒ Monetary;
☐ Nonmonetary declaratory or injunctive relief;
☐ Punitive

V. NUMBER OF CAUSES OF ACTION: []
(Specify)

1

VI. IS THIS CASE A CLASS ACTION LAWSUIT?

- ☒ yes
☐ no

VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- ☒ no
☐ yes If "yes," list all related cases by name, case number, and court.

VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- ☒ yes
☐ no

IX. DOES THIS CASE INVOLVE ALLEGATIONS OF SEXUAL ABUSE?

- ☐ yes
☒ no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Balazs Vigh
Attorney or party

Fla. Bar # 1031540
(Bar # if attorney)

Balazs Vigh
(type or print name)

02/20/2023
Date

RETURN OF SERVICE

State of Florida

County of Broward

Circuit Court

Case Number: CACE-23-002133

Plaintiff:

**LOUIS SS. TOLL AND STACY S. TOLL, ON BEHALF OF THEMSELVES
AND THOSE SIMILARLY SITUATED**



CWO2023005733

vs.

Defendant:

FLORIDA POWER & LIGHT COMPANY

For:

BALAZS VIGH
THE LEGAL WAY, P.A.
700 UNIVERSE BLVD.
JUNO BBACH, FL 33408

Received by C.W. SERVICES & ASSOCIATES, INC. on the 24th day of February, 2023 at 1:27 pm to be served on **FLORIDA POWER & LIGHT COMPANY, DAVID M. LEE, REGISTERED AGENT, 700 UNIVERSE BLVD., JUNO BEACH, FL 33408.**

I, ELIZABETH BOCKMEYER, do hereby affirm that on the **27th day of February, 2023 at 10:57 am, I:**

served a **REGISTERED AGENT** by delivering a true copy of the **Summons, Complaint and Exhibit(s)** with the date and hour of service endorsed thereon by me, to: **Lorena Sardinha as Registered Agent** at the address of: **DAVID M. LEE, REGISTERED AGENT, 700 UNIVERSE BLVD., JUNO BEACH, FL 33408** on behalf of **FLORIDA POWER & LIGHT COMPANY**, and informed said person of the contents therein, in compliance with state statutes.

Description of Person Served: Age: 30, Sex: F, Race/Skin Color: White, Height: 5'4", Weight: 125, Hair: Light Brown, Glasses: Y

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server in good standing in the judicial circuit in which the process was served. Under Penalties of Perjury, I Declare I have Read the Foregoing Document and the Facts Stated in it are True. No Notary is Required Pursuant to Florida State Statute 92.525(2)

ELIZABETH BOCKMEYER
Process Server 1156

C.W. SERVICES & ASSOCIATES, INC.
4908 Grassleaf Drive
Palm Beach Gardens, FL 33418
(561) 630-4866

Our Job Serial Number: CWO-2023005733

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those
similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

CASE NO. CACE-23-002133

DIVISION 04

NOTICE OF APPEARANCE AND DESIGNATION OF EMAIL ADDRESS

NOTICE IS GIVEN that Jason D. Sternberg of Quinn Emanuel Urquhart & Sullivan LLP shall appear as counsel for Defendant Florida Power & Light company in this matter.

Defendant further designates the following email addresses for service of all documents pursuant to the Florida Rules of Judicial Administration:

Primary: jasonsternberg@quinnemanuel.com

Secondary: olgagarcia@quinnemanuel.com

Respectfully submitted,

By: /s/ Jason D. Sternberg

Jason D. Sternberg

Fla. Bar No. 72887

QUINN EMANUEL URQUHART & SULLIVAN, LLP

2601 South Bayshore Drive, Suite 1550,

Miami, FL 33133

Telephone: (305) 402-4880

jasonsternberg@quinnemanuel.com

*Counsel for Defendant Florida Power
& Light Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served on all counsel of record via the Court's E-Filing Portal this 10th day of March, 2023.

By: /s/ Jason D. Sternberg

Jason D. Sternberg

Fla. Bar No. 72887

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those
similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

CASE NO. CACE-23-002133

DIVISION 04

NOTICE OF APPEARANCE AND DESIGNATION OF EMAIL ADDRESS

NOTICE IS GIVEN that Samuel G. Williamson of Quinn Emanuel Urquhart & Sullivan
LLP shall appear as counsel for Defendant Florida Power & Light company in this matter.

Defendant further designates the following email addresses for service of all documents
pursuant to the Florida Rules of Judicial Administration:

Primary: samwilliamson@quinnemanuel.com

Secondary: olgagarcia@quinnemanuel.com

Secondary: gusterlinecharles@quinnemanuel.com

Respectfully submitted,

By: /s/ Samuel G. Williamson

Samuel G. Williamson

Fla. Bar No. 1033817

QUINN EMANUEL URQUHART & SULLIVAN, LLP

2601 South Bayshore Drive, Suite 1550,

Miami, FL 33133

Telephone: (305) 402-4880

samwilliamson@quinnemanuel.com

*Counsel for Defendant Florida Power
& Light Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served on all counsel of record via the Court's E-Filing Portal this 14th day of March, 2023.

By: /s/ Samuel G. Williamson

Samuel G. Williamson

Fla. Bar No. 1033817

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those
similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

CASE NO. CACE-23-002133

DIVISION 04

**DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO COMPLAINT**

Defendant FLORIDA POWER & LIGHT COMPANY ("FPL"), through its undersigned counsel, hereby submits this *unopposed* motion for an enlargement of time to respond to the Complaint filed by Plaintiffs LOUIS S. TOLL and STACY TOLL in the above-captioned case, and states as follows:

1. On February 20, 2023, Plaintiffs initiated the above-captioned case and filed the Complaint, alleging one common law nuisance claim against FPL.
2. On February 27, 2023, Plaintiffs served FPL with a Summons and the Complaint in this case.
3. FPL's responsive pleading to Plaintiffs' Complaint is presently due on March 20, 2023.
4. To allow undersigned counsel sufficient time to get up to speed, and due to the press of other professional commitments, FPL requests a twenty (20) day extension to the deadline to respond to Plaintiffs' Complaint, up through April 10, 2023.
5. Plaintiffs do not oppose the requested extension.

CASE NO.: CACE-23-002133 Division 04

6. This Motion has been filed in good faith and not for the purpose of delaying this litigation or for any other purpose.

WHEREFORE, FPL respectfully requests that the Court grant this Motion and enlarge the deadline for FPL to respond to Plaintiffs' Complaint by twenty (20) days, up to and including APRIL 10, 2023. A proposed agreed Order granting this relief is attached as Exhibit A.

Dated: March 16, 2023

Respectfully submitted,

By: /s/ Jason D. Sternberg

Samuel G. Williamson

Fla. Bar No. 1033817

Jason D. Sternberg

Fla. Bar No. 72887

QUINN EMANUEL URQUHART & SULLIVAN, LLP

2601 South Bayshore Drive, Suite 1550,

Miami, FL 33133

Telephone: (305) 402-4880

samwilliamson@quinnemanuel.com

jasonsternberg@quinnemanuel.com

Secondary: olgagarcia@quinnemanuel.com

Counsel for Defendant Florida Power & Light Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served on all counsel of record via the Court's E-Filing Portal on this 16th day of March, 2023.

By: /s/ Jason D. Sternberg
Jason D. Sternberg
Fla. Bar No. 72887

EXHIBIT A

NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those
similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

CASE NO. CACE-23-002133

DIVISION 04

**AGREED ORDER ON DEFENDANT'S UNOPPOSED MOTION
FOR ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT**

THIS CAUSE having come before the Court on Defendant Florida Power & Light Company's ("FPL") Unopposed Motion for Enlargement of Time to Respond to Complaint ("Motion"), and the Court being otherwise fully advised in the premises, it is hereby ORDERED as follows:

The Motion is hereby GRANTED. FPL shall respond to the Complaint on or before **APRIL 10, 2023**, with FPL reserving all rights and defenses.

DONE AND ORDERED in Broward County, Florida on this ____ day of March, 2023.

HON. WILLIAM W. HAURY, JR.
CIRCUIT COURT JUDGE

Copies to: All counsel of record

**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO. CACE23002133 DIVISION: 04 JUDGE: Haury, William W., Jr. (04)

Louis S Toll, et al

Plaintiff(s) / Petitioner(s)

v.

Florida Power & Light Company

Defendant(s) / Respondent(s)

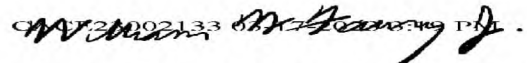
_____ /

**AGREED ORDER ON DEFENDANT'S UNOPPOSED MOTION FOR ENLARGEMENT OF
TIME TO RESPOND TO COMPLAINT**

THIS CAUSE having come before the Court on Defendant Florida Power & Light Company's ("FPL") Unopposed Motion for Enlargement of Time to Respond to Complaint ("Motion"), and the Court being otherwise fully advised in the premises, it is hereby ORDERED as follows:

The Motion is hereby GRANTED. FPL shall respond to the Complaint on or before **APRIL 10, 2023**, with FPL reserving all rights and defenses.

DONE AND ORDERED in Chambers at Broward County, Florida on 17th day of March, 2023.



CACE23002133 03-17-2023 3:19 PM

Hon. William Haury Jr

CIRCUIT COURT JUDGE

Electronically Signed by William Haury Jr

Copies Furnished To:

Balazs Vigh , E-mail : eservice@thelegalway.us

Balazs Vigh , E-mail : balazs@thelegalway.us

Jason D Sternberg , E-mail : jasonsternberg@quinnemanuel.com

Jason D Sternberg , E-mail : olgagarcia@quinnemanuel.com

Maria Gil , E-mail : mariagil@quinnemanuel.com

Quinn Emanuel Calendar Clerk , E-mail : calendar@quinnemanuel.com

Samuel Gates Williamson , E-mail : gusterlinecharles@quinnemanuel.com

Samuel Gates Williamson , E-mail : samwilliamson@quinnemanuel.com

NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NUMBER: CACE-23-002133
DIVISION 04

LOUIS S. TOLL and STACY S. TOLL,
on behalf of themselves and those similarly situated,

Plaintiffs,

v.

FLORIDA POWER & LIGHT COMPANY,

Defendant.

NOTICE OF UNAVAILABILITY

Balazs Vigh, counsel for Plaintiffs, LOUIS S. TOLL, at all, hereby gives notice of unavailability during the time period of May 8 - 23, 2023. The undersigned counsel respectfully requests to be excused from participating in court appearances during that time period.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and served on all counsel of record via the Court's E-Filing Portal this 17th day of March, 2023.

Respectfully submitted.

The Legal Way, P.A.
Representing Plaintiffs
1835 E. Hallandale Beach Blvd.
Suite 872, Hallandale Beach, FL-33009.
Phone: 954-816-8155

/s/ Balazs Vigh

BALAZS VIGH, ESQ.
Florida Bar No. 1031540

balazs@thelegalway.us

For Service of Documents Only:

eservice@thelegalway.us